

GROUP TAX POLICY

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Executive Summary

The nature of the business structure within Franki UK means that several different direct and indirect taxes apply and that there are many transactions between the individual businesses within the company structure and wider group businesses overseas. The complexity of our business structure requires significant focus on tax management.

Compliance

Franki UK is subject to national tax rules. We always apply best practice and act in accordance with national tax rules on tax computation as well as tax reporting. Complying with tax rules is often complex as legislation and case law are subject to constant changes. It is a basic requirement that we always comply with the letter of the law or the legislators' intention with the law. We regularly evaluate our processes and controls to ensure that we are compliant with national rules relevant to Franki UK.

Transparency

Our organisation and company structure only support our business activities. We do not use contrived or abnormal tax structures, such as tax havens, that are intended for tax avoidance or that have no commercial substance. We are transparent in our approach to tax, and we communicate about our tax policy in a transparent and understandable manner.

Local tax payments

Franki UK pay taxes in accordance with local tax legislation. Given the structure of the group businesses, personal taxes, corporation taxes, fees, transfer pricing and VAT are particularly important areas when it comes to conducting our tax practice responsibly.

Use of incentive schemes

Governments often implement specific tax rules to incentivise certain activities such as encouraging companies to increase investments in order to stimulate growth or to create jobs. We use available incentives and tax reliefs in areas where we have commercial substance and where this is the legislators' intention.

Dialogue with tax authorities

We maintain an open and clear dialogue with national tax authorities. In situations where we cannot resolve disagreements with tax authorities through dialogue, we resolve our disagreements in the tax tribunals or courts to ensure that we comply with the appropriate practices on the area. We make ourselves available if the authorities ask for our assessment of the consequences of a tax transaction.

Communication

We aim at having a transparent communication about tax conditions, and the goal is to meet the interests of all relevant stakeholders.

Implementation of the tax policy


The principles of this policy apply to the Franki UK Group. The principles are reflected in internal operational guidelines and in processes established to ensure that the policy is embedded in the daily operations.

Legislation

This strategy has been prepared to ensure compliance with schedule 19 of Finance 2016 – UK sub-groups duty to publish a sub-group tax strategy as the head of the Besix UK sub-group. The intentions are for this document to remain published free of charge on the website of each sub company.

Approval

Craig Macklin



Group Managing Director

Oct 2025

Signed on behalf of the UK group senior management team and board of directors.

Appendix

Definitions

- The term “Franki UK” is used synonymously with “company structure”.
- The word “Taxes” comprises:
 - Corporation Tax
 - Input/Output VAT
 - PAYE
- The terms “company structure” and “UK sub-group” comprises:
 - Franki Foundations UK Limited
 - Martello (Holdings) Limited
 - Martello Piling Limited
 - High Mead Developments Limited
 - Able Piling & Construction Limited
- The term “board of directors” comprises all statutory directors per companies’ house.

References

- Legislation.gov.uk. (2016). Finance Act 2016. [online] Available at: <https://www.legislation.gov.uk/ukpga/2016/24/schedule/19/part/2> [Accessed 4 Oct. 2024]
- HM Revenue & Customs (2016). Publish your large business tax strategy. [online] GOV.UK. Available at: <https://www.gov.uk/guidance/large-businesses-publish-your-tax-strategy#what-must-be-in-your-strategy> [Accessed 4 Oct. 2024]
- Service.gov.uk. (2024). FRANKI FOUNDATIONS UK LIMITED filing history - GOV.UK. [online] Available at: <https://find-and-update.company-information.service.gov.uk/company/02897887/filing-history> [Accessed 4 Oct. 2024].
- Franki Foundations UK Limited (1AD). A1.10 Franki Foundations UK Group - Associated Companies. p.1

Supplementary Material

- Extract from Finance Act 2016 s. 17:

- (1) A group tax strategy required to be published on behalf of a UK group by paragraph 16 must set out—
- (a) the approach of the group to risk management and governance arrangements in relation to UK taxation,
 - (b) the attitude of the group towards tax planning (so far as affecting UK taxation),
 - (c) the level of risk in relation to UK taxation that the group is prepared to accept, and
 - (d) the approach of the group towards its dealings with HMRC.
- (2) The group tax strategy may—
- (a) include other information relating to taxation (whether UK taxation or otherwise), and
 - (b) deal with a matter mentioned in sub-paragraph (1) by reference to the group as a whole or to individual members of the group (or to both).

(3)The information required by sub-paragraph (1) to be included in the group tax strategy does not include any information about activities of any member of the group that consists of the provision of tax advice or related professional services to persons who are not members of the group.

(4)The publication of information as the group tax strategy does not constitute publication of the strategy for the purposes of paragraph 16 unless the UK company publishing it makes clear (in a way that will be readily apparent to anyone accessing the information online) that the company regards its publication as complying with the duty under paragraph 16(2) in the current financial year.

(5)For the purposes of this paragraph a UK permanent establishment of a foreign member of the group is to be treated as if it were a member of the group.

(6)The Treasury may by regulations require the group tax strategy to include a country-by-country report.

(7)In this paragraph “country-by-country report” has the meaning given by the Taxes (Base Erosion and Profit Shifting) (Country-by-Country Reporting) Regulations 2016.

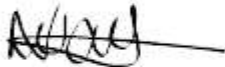
- Associated Companies



Franki Foundations UK Group – Associated Companies

Company	Reg. Number	Address
Franki Foundations UK Limited	0289 7887	Statom House 795 London Road Grays, Essex RM20 3LH
Able Piling & Construction Limited	1375 9816	Statom House 795 London Road Grays, Essex RM20 3LH
Martello (Holdings) Limited	1000 3943	Statom House 795 London Road Grays, Essex RM20 3LH
Martello Piling Limited	0409 4068	Statom House 795 London Road Grays, Essex RM20 3LH
High Mead Developments Limited	0365 9138	Statom House 795 London Road Grays, Essex RM20 3LH

I certify that the aforementioned companies comprise the organisational structure of the Franki Foundations UK Group, whereby each company is wholly owned by Franki Foundations UK Limited (0289 7887). Furthermore, Franki Foundations UK Limited (02897887) is wholly owned by Statom Holdings Limited (1249 2751).



Naomi Waite
Financial Director

Franki Foundations UK Group Finance Department
01489 333 400